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7 **UNITED STATES DISTRICT COURT**
8 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**
9 **LOS ANGELES**

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11 DISH NETWORK LLC., a Colorado
Limited Liability Company, et al.

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13 Plaintiff,

14 v.

15 KHACHIK BAGDASARYAN aka
16 CHRIS BAGDASARYAN,
Defendants.

CASE NO.: CV 09-03351 PSG (CWx)

**MOTION FOR EXTENSION OF TIME
FOR DEADLINE OF REBUTTAL OF
EXPERT REPORTS**

No Hearing Required

*[Assigned to Honorable Judge Ronald
B. Leighton]*

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19 Defendant, Khachik Bagdasaryan, respectfully files this Motion seeking
20 permission to extend deadline for rebuttal of expert reports for additional 30 days
21 to April 1, 2010, and in support of the same would show the Court as follows:

22 The deadline to submit the rebuttal of expert reports under Joint Status
23 Report filed on September 8, 2009 is March 1, 2010. Plaintiff has submitted a
24 227 page expert report on February 1, 2010. Due to the complexity and the high
25 volume of the expert report, the Defendant requires additional time to submit a
26 rebuttal. Defense counsel was unable to contact Plaintiff's counsel by phone or
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1 email and could not obtain a timely stipulation. Plaintiff will not be prejudiced if
2 such an extension is granted. Therefore, the Defendant respectfully requests the
3 Court to issue an Order extending the deadline to submit a rebuttal of the expert
4 report on or before April 1, 2010.

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6 Dated: March 1, 2010

Respectfully submitted,

7 LAW OFFICES OF JILBERT TAHMAZIAN

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Jilbert Tahmazian
Attorney for Defendant

PROOF OF SERVICE

I am employed in the county of Los Angeles, State of California in the offices of a member of the State Bar of California at whose direction this service was made. I am over the age of 18 and not a party to the within action. My business address is 1518 West Glenoaks Boulevard, Glendale, California 91203.

On the date set forth below, I served the foregoing document described as **MOTION FOR EXTENSION OF TIME** on the interested parties in this action by placing true copies thereof enclosed in sealed envelope with postage thereon fully prepaid and addressed as set forth as follows:

Chad M. Hagan (*pro hac vice*)
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 X by Electronically Transmitting the foregoing document(s) to the person(s) at the electronic address(es) set forth below pursuant to the parties' service agreement in this litigation.

 by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid in the United States Mail at Houston, Texas addressed as set forth below.

I declare under penalty of perjury and the laws of the State of California that the foregoing is true and correct. Executed on March 1, 2010, in the City of Glendale, State of California.

 /s/ Alex Van Kovn
Alex Van Kovn